U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
AUG 15 2017
CLERK, U.S. DISTRICT COURT
By Deputy

UNITED STATES DISTRICT COURT

for the
Northern District of Texas

In the Matter of the Search of
(Briefly describe the property to be searched or identify the person by name and address)

1905 Dakar Road East, Fort Worth, Texas 76116 and 2016 black Dodge Ram 1500 crew cab four wheel drive pick-up truck, VIN 1C6RR7LT1GS292291, HXH-8227

Case No. 4:17-MJ-682

FILED UNDER SEAL

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:
1905 Dakar Road East, Fort Worth, Texas 76116 and
2016 black Dodge Ram 1500 crew cab four wheel drive pick-up truck, VIN 1C6RR7LT1GS292291, HXH-8227

located in the Northern District of Texas, there is now concealed *(identify the person or describe the property to be seized)*:
See Attachment "B"

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:
- ☑ evidence of a crime;
- ☑ contraband, fruits of crime, or other items illegally possessed;
- ☑ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	*Offense Description*
18 U.S.C. § 1343	Wire Fraud

The application is based on these facts:

See attached Affidavit.

- ☐ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: __________) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[signature]
Applicant's signature

FRANK B SUPER SPECIAL AGENT
Printed name and title

Sworn to before me and signed in my presence.

Date: 8/15/17

[signature]
Judge's signature

City and state: Fort Worth, Texas

Jeffrey L. Cureton, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

INTRODUCTION

I have been a Special Agent of the Federal Bureau of Investigation (FBI) for 20 years and am assigned to the Dallas Field Division's Fort Worth Resident Agency on the Complex Financial Crime Squad. As a Special Agent, I am charged with the duties of investigating violations of the criminal laws of the United States, including investigating violations of 18 U.S.C. § 1343, wire fraud.

The information contained in this Affidavit is the result of my own investigation as well as information provided to me by other investigators and law enforcement officers. In each instance when I recite information from such others, I have gained that information by either talking directly to such investigators and law enforcement officers or reviewing written reports of their investigation, or both. This Affidavit accurately summarizes the evidence I discovered during my investigation; however, it does not contain every detail known to me about the investigation.

Based on Affiant's training, experience, and participation in this investigation, Affiant knows that:

a. Fraud offenders often maintain in their businesses, residences, and automobiles: books, records, receipts, notes, ledgers, computers, computer discs, drives, money orders, and other papers relating to their fraudulent activity;

b. It is common for fraud offenders to secrete records related to their fraud in secure locations within their residences, businesses, automobiles, safes, vaults and obscure locations known only to them, i.e., mail drops, mini storage warehouses, etc., to conceal them from law enforcement;

c. Such offenders often possess evidence, fruits, and instrumentalities relating to such offenses in their businesses, residences and automobiles.

PURPOSE OF AFFIDAVIT

This affidavit is made in support of an application for a warrant to search the residence at 1905 Dakar Road East, Fort Worth, Texas, 76116, and a 2016 black Dodge Ram 1500 crew cab four wheel drive pick-up truck, VIN: 1C6RR7LT1GS292291, Texas license plate number HXH-8227, and to seize any and all items as described in **Attachment B**, including, but not limited to, all cellular telephones, computers, computer printers, electronic media, blank check stock, checks, bank records, U.S. Currency, money orders, money order receipts, any other evidence indicating where/how the proceeds were spent, and any other evidence related to a possible violation of 18 U.S.C. § 1343, wire fraud. This Affidavit is intended to show there is sufficient probable cause for the requested search warrant and does not purport to set forth a comprehensive summary of the investigation of this matter.

SUBJECT PREMISES AND ITEMS

The premises to be searched, a residence located at 1905 Dakar Road East, Fort Worth, Texas, 76116, and the 2016 black Dodge Ram 1500 crew cab four-wheel drive pick-up truck. The items to be searched and seized, are more particularly described in **Attachments A** and **B**.

Affiant has probable cause to believe the items described in **Attachment B** will be found within the residence 1905 Dakar Road East, Fort Worth, Texas, and/or in the 2016 black Dodge Ram 1500 crew cab four-wheel drive pick-up truck. Affiant also believes said items constitute evidence of the commission of a federal criminal offense, 18 U.S.C. § 1343, wire fraud. Said items constitute contraband, fruits of the above criminal offense, things otherwise criminally possessed, or property designed or intended for use or which is or has been used as the means of committing a criminal offense.

PROBABLE CAUSE

Scheme to Defraud

Micaha "Mike" Paul Sneed, also known as Micaha McGrath, (hereafter McGrath), is a resident of Fort Worth, Texas, currently residing at 1905 Dakar Road East. McGrath has at least 40 alias names, and given the name, Micaha Paul Sneed, at birth. Beginning in or before 2008, McGrath devised and operated a scheme and artifice to defraud, and to obtain money by means of false and fraudulent material pretenses and representations, in that, after first befriending BK and DW, he solicited and obtained money from victims, including BK, DW, RM, EC, MH, and KH, by making false representations that he was in a civil lawsuit with the federal government suing for the proceeds of his father's estate.

Starting in or before 2008, until in or about February 2011, McGrath asked BK and DW for over $500,000 in cash for lawsuit expenses. They paid him in cash, which they obtained from their IRA and 401K retirement accounts. McGrath then befriended BK's friend, RM, who was then 91 years old. Eventually, McGrath moved in with RM, and from in or about 2012, until in or about 2015, McGrath convinced RM to give him over $200,000 to pay bogus court fees. Through RM, McGrath befriended EC, a friend of RM's, who was in his eighties.

Beginning in or about the middle of 2015, EC began making cash payments directly to McGrath, who told EC the same false story about needing cash to pay court fees related to a federal lawsuit involving his father's estate. McGrath told EC that the estate was worth $250 million and promised EC over $20 million upon settlement. EC told McGrath he was liquidating his retirement accounts to obtain the cash McGrath needed. In particular, on or about November 10, 2015, McGrath knowingly caused to be transmitted, by means of wire communication in interstate commerce, a wire transfer of $30,000 from EC's brokerage account at Edward Jones in Fort Worth, Texas, via St. Louis, Missouri or Tempe, Arizona, to EC's bank account at USAA in San Antonio, Texas, so that a portion of the transferred funds could be used to meet McGrath's demand for cash.

In or about September 2015, EC asked his daughter, MH, and son-in-law, KH, to help McGrath pay expenses related to the lawsuit. McGrath promised to pay MH and KH over $14 million as their share of the estate. MH and KH also told McGrath that they had to liquidate investment/retirement accounts to obtain cash. McGrath provided EC, KH and MH with falsely altered court documents from an existing case filed in the Northern District of Texas to prove the existence of the federal lawsuit. Based upon research in Pacer, the court documents related to cause number 3:12-CR-413-L, a case filed on March 5, 2014, in United States District Court, involving a defendant named BLB. The document McGrath provided to the victims had been altered. The filing date had been removed and McGrath's name had been inserted as the defendant.

In furtherance of the scheme, McGrath demanded that the victims deliver the cash to him in a parking lot near the intersection of Route 183 and Green Oaks Road in Fort Worth. On several occasions, McGrath collected the cash in his 2016 Dodge Ram 1500 crew cab. That truck has been observed at the Dakar address since July 27, 2017.

Each time EC, KH and MH accessed their investment accounts to meet McGrath's demands for cash, it caused interstate wire communications. As a result of McGrath's fraud scheme, EC, KH and MH paid McGrath approximately $1,236,000 in cash.

PROBABLE CAUSE TO SEIZE ITEMS

Request for Permission to Seize Computers, Peripherals, Other Devices and Documents Located at 1905 Dakar Road East and in the Dodge Truck, to Search for Information

McGrath resides at 1905 Dakar Road East, Fort Worth, Texas, and has no known place of business. Based on the investigation of this case, it has been determined that McGrath has used computers, computer-generated documents, text messages, cellular telephones, email, and falsified documents to further his scheme to defraud. Items to be seized are described **Attachment B**.

In an email dated May 22, 2017, from McGrath to EC and MH, McGrath cautioned the victims about the existence of a gag order in the case, stating that there would be no settlement of the estate if the victims were to violate it.

In or between July 14, 2015, and June 29, 2017, McGrath provided at least ten checks to EC, KH and MH, that appeared to be counterfeit or altered. McGrath falsely represented that they were partial proceeds from the estate. For example, five checks, dated July 14, 2015, and January 8, 9, 10 and 18, 2016, were purportedly written from an American Express Centurion Bank account belonging to MCG Industry of 6387B Camp Bowie Boulevard, Suite 281, and made payable to EC. EC deposited three checks, dated January 8, 9 and 10, 2016, but all three were returned because EC's bank could not locate the account listed on the checks. EC did not attempt to deposit the other two checks because McGrath told him no funds were available. McGrath gave EC three other checks, dated October 11, 2015, November 16, 2015 and November 29, 2015, similar in appearance to the first five. They were purportedly third party checks and appear to have been altered. EC did not attempt to deposit those three checks either, as McGrath again said that no funds were available.

Two checks dated June 29, 2017, for $62,500 each, were written from a "Regant Bank" account styled "MCG Industry Trust." Again, McGrath told EC and KH not to cash those checks until, "his friend established his living trust." McGrath later contacted EC and KH to tell them not to cash the checks because his friend did not set up the trust. The investigation later revealed that the bank's name was misspelled and its purported address was incorrect.

Likewise, MCG Industry appears to be a fictitious company, further evidence that McGrath produced the counterfeit checks. In three loan applications for vehicle financing dated July 25, 2014, January 23, 2016 and September 20, 2016, McGrath listed his employer as MCG Industries. The address he provided was 8801 West Freeway, Fort Worth, the location of a public storage business. According to a website set up for MCG Industries, it purportedly is a computer server business, not a storage business. It is not registered with the Texas Secretary of State and does not appear in the Tarrant County Clerk's registry of business names. It appears to be an acronym based on McGrath's initials.

In connection with his vehicle loans, McGrath was required to make payments via money order because the checks were returned when the bank could not locate the account the checks were drawn upon. Receipts for the money orders may provide evidence of how McGrath spent the proceeds of the crime.

McGrath has maintained contact with some of the victims and has communicated with them using two different cell phone numbers. Beginning in or before August 2015, until June 2017, McGrath sent approximately 7,800 text messages to EC, KH and MH from telephone number (817) 845-8909. More recently, he has communicated with them using telephone number (682) 558-0539.

McGrath provided EC, KH and MH with falsified and altered court documents from an existing case filed in the Northern District of Texas to prove the existence of his lawsuit with the federal government. McGrath's ability to obtain and alter court documents, create false checks, and send email indicate that he possesses technology, including a computer, a printer and other devices.

EVIDENCE OF OWNERSHIP, CONTROL AND/OR POSSESSION

Affiant conducted an Internet database check on Thomson-Reuters-Clear for social security number (SSN) 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, which is the SSN listed by McGrath on three auto loan applications. The database revealed a utility company listing for McGrath at 1905 Dakar Road East, Fort Worth, Texas 76116, dated October 29, 2016. On two of the auto loan applications, dated January 23, 2016, and September 20, 2016, McGrath listed as a reference Kristin Simmons with an address of 721 Arcady Lane, Colleyville, Texas, 76034. A Thomson-Reuters-Clear database check of Simmons showed an additional residence of 1905 Dakar Road East, Fort Worth, Texas, 76116 dated April 20, 2017.

Beginning July 27, 2017 and continuing to the present day, Affiant and other investigators conducted surveillance at 1905 Dakar Road East, Fort Worth, Texas. Each morning at approximately 7:00 am, a 2016 black Dodge Ram 1500 crew cab four-wheel drive pick-up truck, Texas license plate number HXH-8227, known to belong to McGrath was seen in the carport of the residence. On two occasions, first on August 3, and then again on August 7, McGrath was seen departing and then returning to the residence driving the Dodge Ram.

The investigation has revealed that McGrath has no record of employment since 2005, and has since listed MCG Industries, a fictitious company as his employer on vehicle loan applications. He is, therefore, likely to have, in his residence or in his truck, belongings, including personal items such as computers, phones, printers, and related devices, along with counterfeit check making materials, money order receipts, and other papers/documents related to his fraudulent scheme, motives, and victims.

CONCLUSION

Based upon the foregoing and upon Affiant's training and experience, I submit there is probable cause to believe that evidence, fruits and instrumentalities, as described in **Attachment B**, pertaining to violations of 18 U.S.C. § 1343, (wire fraud) will be located at 1905 Dakar Road East, Fort Worth, Texas, and in a 2016 black Dodge Ram 1500 crew cab four wheel drive pick-up truck, each more fully described in **Attachment A**.

Frank Super
Special Agent, Federal Bureau of Investigation

SWORN AND SUBSCRIBED before me, at 1:20 am/pm this 15th day of August, 2017, at Fort Worth, Texas.

JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A
PLACES TO BE SEARCHED

1. **1905 Dakar Road East, City of Fort Worth, County of Tarrant, State of Texas 76116**: Further described as a single family, single story home with basement, five bedrooms with light brown stone exterior light colored wood siding in the center of the front and covering the entire rear of the house. The house has a circular drive on the north side of the house, (facing Dakar Road East), with a two car sized carport in the middle of the drive in front of the house. The roof is covered with dark brown composite shingles. The front door faces north, is dark brown, and contains two glass panels on the top half. The numbers "1905" are clearly painted in white lettering with a black background on the curb on the east opening of the circular driveway facing Dakar Road East.

2. **Dodge Pick-up Truck**: Further described as a 2016 black Dodge Ram 1500 crew cab four-wheel drive pick-up truck, VIN: 1C6RR7LT1GS292291, Texas license plate number HXH-8227.

ATTACHMENT B

1. Cash, checks, money orders, cashiers checks, official checks
2. Check stock
3. All Computers, computer hardware, computer software, PDAs; and all passwords, or security measures to access that information.
4. All telephones or cellular phones, any apparatus required for the functioning of said devices, and any service provider bills or correspondence.
5. All printers, scanners or other such devices, and cables necessary for operation.
6. Bank statements, brokerage statements, records of deposits, cancelled checks, wire transfer advices (incoming and outgoing), or other financial transactions.
7. Safe deposit box rental information and/or keys.
8. Mail; opened and unopened.
9. Any and all records related to personal expenditures for Micaha Paul McGrath.
10. All documents pertaining to storage facilities.
11. All records and information relating to violations of wire fraud or other related criminal violations.
12. All records related to the purchase of any business.
13. All promissory notes, loans, loan applications or other extensions of credit.
14. Credit card, debit card receipts and monthly statements.
15. All email correspondence.
16. Records of control of the premises and things described herein, namely, utility bills, telephone bills, rent or mortgage records pertaining to, or evidencing ownership or control of the premises to be searched.

The terms "records" and "information" include all of the foregoing items of evidence in whatever means they may have been created of stored, including any electrical, or magnetic form (such as any information on an electronic or magnetic storage device, including floppy diskettes, hard discs, ZIP drives, USB drives, memory sticks, DVDs, CD-ROMS, optical discs, backup tapes, printer buffers, smart cards, memory calculators, pagers, and personal digital assistants.